Received & Inspected

MAR - 9 2009

FCC Mail Room

March 5, 2009 EB Docket NO. 06-36

Ms. Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street SW, Suite TW-A325 Washington, DC 20554

Reference: Cutthroat Communications a TransAria, Inc. Company, Certification of CPNI Filing of Cutthroat Communications, Inc.

Dear Ms. Dortch:

Enclosed is the CPNI compliance certificate of Cutthroat Communications, Inc. FRN 0004533832 in response to the Public Notice issued by the Federal Communication Commission's Enforcement Bureau on January 30, 2006 and FCC 07-22 released on April 2, 2007.

Please contact me with any questions or concerns.

Sincerely

Name Jeffrey B Tarbert Title Sr VP Operations/GM

Phone: 406-556-1751

E-mail: jtarbert@cutthroatcom.com

No. of Copies rec'd 044 List ABCDE

Before the Federal Communications Commission Washington, D.C. 20554

MAR - 9 2009

FCC Mail Room

CPNI Compliance Certification)	EB-06-TC-060, EB Docket No. 06-36
As Required by FCC Enforcement)	Cutthroat Communications, Inc.
Bureau, DA 06-223)	FRN 0004533832

CUTTHROAT COMMUNICATIONS, A TRANSARIA, INC. COMPANY CERTIFICATION OF CPNI COMPLAINCE FOR THE 2008 CALENDAR YEAR

- 1. Cutthroat Communications, Inc. ("Cutthroat"), FRN 0004533832 is submitting this compliance certificate in response to the Public Notice issued by the FCC's Enforcement Bureau on January 30, 2006 (DA 06-223), and Report and Order FCC 07-22, pursuant to section 64.2009(e) of the Federal Communication Commission's rules.
- 2. I am the Sr. V.P. of Operations/GM, for Cutthroat. I make this certification from my personal knowledge of the CPNI procedures and policies of Cutthroat.
- 3. Cutthroat expects to use CPNI for marketing purposes and has noticed customers under the "opt-out" provisions of the rules. Cutthroat's use of CPNI is and will be done in strict compliance with the principles and requirements outlined in Subtitle U of the Commission's rules. Accordingly, Cutthroat's personnel are trained in the proper use of CPNI for such purposes. Because CPNI will be used for marketing purposes, Cutthroat has established the appropriate safeguards for this type of use of CPNI data. These safeguards include documentation of this policy in company procedures and training of company personnel with regard to use of CPNI data.
- 3. On behalf of Cutthroat, I certify that, pursuant to the Commission's rules, Cutthroat has established procedures that are adequate to ensure compliance with CPNI rules currently in effect and the statements contained in this filing are correct.

Jeffrey B. Tarbert

Sr. ♥.P. of Operations/GM

Received & Inspected

Before the Federal Communications Commission Washington, D.C. 20554

MAR - 9 2009 FCC Mail Room

CPNI Compliance Certification)	EB-06-TC-060, EB Docket No. 06-3	6
As Required by FCC Enforcement)	Cutthroat Communications, Inc.	
Bureau, DA 06-223)	FRN 0004533832	

CUTTHROAT COMMUNICATIONS, A TRANSARIA, INC. COMPANY CERTIFICATION OF CPNI COMPLAINCE FOR THE 2008 CALENDAR YEAR

OPERATING PROCEDURES STATEMENT

- 1. Customer account prominently displays "CPNI" so that Customer Sales and Service Representatives (CSSRs) can readily identify customers opting to restrict use of their CPNI. When calls are received by CSSRs from customers with this preferred treatment they ask for customer permission to access account information.
- 2. Customers are given an opportunity to "opt-out" of CPNI usage beginning with the install of service. Additionally, customers may "opt-out" at any time.
- 3. Notice regarding customer CPNI rights and Cutthroat's duty to protect CPNI is provided to all new and existing customers in the printed telephone directory. In addition, the notice is also printed once every two years as a message on the customer's billing statement.
- 4. Employees are trained on the proper use and/or disclosure of CPNI. Additionally procedures are documented and readily available to all employees on the company's internal website.
- 5. Access to CPNI data is limited to employees and/or entities with proper authorization as allowed under Commission rules. All employees and/or entities with such access operate under policies and/or contract requiring nondisclosure of confidential information.
- 6. All marketing campaigns and materials are reviewed by a supervisory panel. This will include any use of CPNI data used in any given marketing effort. Please note that as of this time Cutthroat has not used CPNI data in this manner but the proper safeguards are in place should it be used.

- 7. Improper use or disclosure of CPNI is subject to Cutthroat's Work rules and disciplinary policies as outlined in its policy manual. The policy manual is readily accessible by all employees.
- 8. Valid Photo Identification is required when customers come into the Cutthroat office requesting assistance/access to any account information.
- 9. Call detail is only provided in a customer initiated call where the customer identifies the call record consistent with the FCC 07-22. Absent that information call detail will not be released during a customer initiated call. Cutthroat employees have been instructed to either mail the detail to the address of record or refer the customer to the e-bill site.
- 10. Cutthroat does not currently, and has no plans to provide CPNI to a third party for the purposes of marketing.
- 11. Customer initiated changes in passwords or addresses result in a generic notification to the customer using the address of record consistent with FCC rules.

Before the Federal Communications Commission Washington, D.C. 20554

CPNI Compliance Certification)	EB-06-TC-060, EB Docket No. 06-36
As Required by FCC Enforcement)	Cutthroat Communications, Inc.
Bureau, DA 06-223 and FCC 07-22)	FRN 0004533832

CUTTHROAT COMMUNICATIONS, A TRANSARIA, INC. COMPANY FOR THE 2008CALENDAR YEAR

CUSTOMER COMPLAINTS

1. No record of any "complaints" of breaches received in 2008.

Before the Federal Communications Commission Washington, D.C. 20554

CPNI Compliance Certification)	EB-06-TC-060, EB Docket No. 06-36
As Required by FCC Enforcement)	Cutthroat Communications, Inc.
Bureau, DA 06-223 and FCC 07-22)	FRN 0004533832

CUTTHROAT COMMUNICATIONS, A TRANSARIA, INC. COMPANY FOR THE 2008 CALENDAR YEAR

PRETEXTING ACTIVITIES

1. During the 2007 calendar year no pretexting activities were noted, so no actions were undertaken to address such activities.